## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

J-LINE PUMP CO. d/b/a	)	
AMERICAN-MARSH PUMPS,	)	
	)	
Plaintiff,	)	
	)	
v.	) Ca	se No. 3:13-0960
IASON EDDIE DOUGLAS HVDDOELO	) ) <b>T</b> w	las Comphall
JASON EDDIE DOUGLAS, HYDROFLO	*	lge Campbell
PUMPS, USA INC., TACO, INC., AND	) Ma	gistrate Judge Knowles
HEARTLAND PUMP RENTAL AND	)	
SALES, INC.,	)	
	)	
Defendants.	)	

## UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Heartland Pump Rental and Sales, Inc. ("Heartland") moves to extend its time to answer or respond to the complaint against it until November 6, 2013. Counsel for Heartland has conferred with Plaintiff's counsel and Plaintiff does not oppose this motion.

In support of this motion, Heartland states that it only recently retained counsel, and counsel seeks time to understand the matter. The requested extension, which Plaintiff does not oppose, will not delay this matter. Specifically, Heartland's response to the complaint is currently due on October 22, 2013. The Case Management Conference is set for November 14, 2013, and the proposed case management order is due November 11, 2013. (*See* Docket Entry 4.) Thus, if the Court grants the requested extension, Heartland will respond before the Case Management Conference and before the Court schedules either discovery or trial.

Accordingly, Heartland requests that the Court extend its time to respond to the Complaint until November 6, 2013.

Respectfully submitted:

s/ Tim Harvey
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Attorneys for Defendant Heartland Pump Rental and Sales, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon the following via the Court's ECF filing system:

Michele Howard-Flynn
Robert D. Flynn
The HF Law Group, PLLC
3257 W. Sarazen's Circle
Memphis, TN 38125
this the \_\_\_\_\_\_ day of October, 2013

s/Tim Harvey